

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

LAWRENCE BOONE

Defendant

Case No. 5:23-MJ- 688 (ML)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of 11/21/23 in the county of Onondaga in the Northern District of New York the defendant violated:

Code Section
Title 18, United States Code, Section
2252A(a)(2)(A)

Offense Description
Knowingly Receiving Child Pornography

This criminal complaint is based on these facts:
See attached affidavit

☒ Continued on the attached sheet.

LINDSEY R
VALENTINO

Digitally signed by LINDSEY R
VALENTINO
Date: 2023.11.22 09:03:26 -05'00'

Complainant's signature

Lindsey Valentino, Special Agent

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: 11/22/23

Miroslav Lovric

Judge's signature

City and State: Binghamton, NY

Hon. Miroslav Lovric, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Lindsey Valentino, having been first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent employed by the Department of Homeland Security, Homeland Security Investigations (“HSI”). I have been so employed since 2019. As part of my daily duties as an HSI Special Agent, I investigate crimes involving child exploitation and child pornography, including violations pertaining to the production, distribution, transportation, receipt, and possession of child pornography in violation of Title 18, United States Code, Section 2252A. I have received specialized training in child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography in various forms of media, including computer and cell phone media. I also have been involved in the execution of numerous child exploitation search warrants, as well as serving as the affiant for search warrants relating to the possession, receipt and distribution of child exploitative material concerning the Internet, computers, smart phones, electronic devices, and their associated media storage components.

2. This affidavit is made in support of an application for a criminal complaint charging Lawrence BOONE (“BOONE”) with violations of Title 18, United States Code, Section 2252A(a)(2)(A) (receiving child pornography).

BASIS OF INFORMATION

3. The statements contained in this affidavit are based upon my investigation of this matter, information provided by other law enforcement agents, and my experience and training as an HSI Special Agent. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me

concerning this investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause to believe that BOONE has violated Title 18, United States Code, Section 2252A(a)(2)(A).

INVESTIGATION AND FACTUAL BASIS FOR THE COMPLAINT

4. On or about October 25, 2023, New York State Police, acting upon information received from a National Center for Missing and Exploited Children (“NCMEC”) CyberTip Report, obtained a search warrant for Synchronoss Technologies account data associated with phone number 315-XXX-4302. Synchronoss Technologies is a file hosting service and provider for cloud-based storage for Verizon Wireless customers. The search warrant return from Synchronoss Technologies consisted of several electronic documents attributable to BOONE and containing his personal identifiers, including a W-2 form, a W-4 Employee’s Withholding Certificate, and a resume entitled “Larry-Boone.pdf.” The return also contained, based on a review by law enforcement agents, more than 1300 media files consistent with child sexual abuse material (“CSAM”). 1100 of those files were videos, and of those videos, more than 100 were videos depicting infants and toddlers being sexually abused. Your affiant confirmed that some of the CSAM identified in the CyberTip Reports was in fact contained on the return, and had been accessed by BOONE on his Synchronoss account as early as December 3, 2022.

5. On November 20, 2023, New York State Police (“NYSP”) obtained a search warrant for BOONE’s known residence in Syracuse, New York. The warrant also authorized agents to seize any electronic devices attributable to BOONE and search them for CSAM. On November 21, 2023, HSI assisted NYSP in executing the search warrant. During the execution of the warrant, BOONE was located at the residence. He was transported to the NYSP barracks in

North Syracuse for further investigation.

6. At the NYSP barracks, BOONE was advised of his *Miranda* rights. BOONE waived his rights before answering questions. During the ensuing interview, BOONE admitted to receiving CSAM via Telegram. Your affiant knows Telegram to be a file-sharing, social media, and telecommunications application headquartered outside the United States. BOONE stated other Telegram users would message BOONE links to files hosted on Mega. Your affiant knows Mega to be a file-hosting and sharing service headquartered in New Zealand. BOONE stated that each link contained over 50 files of CSAM. BOONE stated he routinely saved the CSAM on multiple devices, including two cellphones, a laptop, and his desktop computer.

7. A blue Samsung Galaxy S22+, IMEI: 357211454706591, Serial Number: RFCT60BN17A, belonging to BOONE and seized on November 21, 2023, pursuant to the search warrant of BOONE's residence was also forensically examined by agents. During that review, the agents discovered the Telegram application installed on the device. Your affiant reviewed the contents of the Telegram app on BOONE's blue Samsung Galaxy and discovered various chat communications between BOONE, whose Telegram username was "LarrosaurusRexx," and other individuals. Ongoing communication between BOONE and phone number 817-XXX-7997 consisted of the exchange of numerous videos and images of CSAM, including:

- a. Video sent by BOONE to 817-XXX-7997 on August 18, 2023, at 2:11pm: The video is approximately one minute and 11 seconds in length. It depicts a naked adult male masturbating to a video of the anal penetration of a prepubescent child. The video inlay of CSAM depicts an adult male penis penetrating the anus of a child under the age of two years old.

- b. Video sent by BOONE to 817-XXX-7997 on August 18, 2023, at 2:11pm: The video is approximately 11 seconds long. It depicts a naked adult male masturbating to a video of a nude prepubescent child. The video inlay of CSAM depicts an adult male using his fingers to touch the inner folds of the vagina of a female child under one year of age. The adult male's penis can be seen in the video inlay as he begins masturbating near the infant's vagina.
- c. Video sent by BOONE to 817-XXX-7997 on August 18, 2023, at 2:11pm: The video is approximately 33 seconds in length. It depicts a computer screen playing a video of a child less than one year of age. An adult male penis is being forced into the infant's mouth multiple times.
- d. Video received from 817-XXX-7997 on August 18, 2023, at 6:36am: The video is approximately 8 minutes and 28 seconds in length. It depicts two nude male children approximately eight to ten years of age. The children perform oral sex on each other and eventually perform anal penetrative sex on one another.
- e. Video received from 817-XXX-7997 on August 25, 2023, at 12:35am: The video is approximately ten seconds in length. It depicts two nude prepubescent male children approximately seven to nine years of age. One child performs oral sex on the other child.
- f. Video received from 817-XXX-7997 on August 17, 2023, at 1:16am: The video is approximately 31 seconds in length. It depicts what appears to be a prepubescent male child approximately five to seven years of age. The child is wearing what appears to be a collar and is completely nude. The male child's penis, buttocks,

and anus are exposed and are the focal point of the video.

8. During the post-*Miranda* interview, BOONE was shown the above Telegram chat and admitted that he had participated in the communication as user “LarrosaurusRexx” and remembered receiving and distributing child pornography during the communication. BOONE also specifically remembered distributing the image referenced in paragraph 7(a) above when shown a still image from the video. BOONE subsequently initialed the still image to confirm.

CONCLUSION

9. Based upon the above information, there is probable cause to establish that BOONE has violated Title 18, United States Code, Section 2252A(a)(2)(A), knowingly receiving child pornography using the means and facility of interstate and foreign commerce, and therein affecting said commerce, and your affiant requests that a criminal complaint be issued pursuant to this violation of federal law.

ATTESTED TO BY THE APPLICANT IN ACCORDANCE WITH THE REQUIREMENTS
OF RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE

LINDSEY R
VALENTINO

Digitally signed by LINDSEY R
VALENTINO
Date: 2023.11.22 09:04:28 -05'00'

Lindsey Valentino
Special Agent
Homeland Security Investigations

I, the Honorable Miroslav Lovric, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on November 22, 2023, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.



Hon. Miroslav Lovric
United States Magistrate Judge